John I? Conomy, M.D.

'Young H. Kim, M.D.



Frederic Lax, M.D.

Gerald **Meier**, M.D.

Scott Van Oosten, D.C.

Cesar Rojas, M.D.

Neurosurgery and Neurology

November 30, 1999

Document Management Branch (HFA-305) Food and Drug Administration 5630 Fishers Lane, Room 1061 Rockville, Maryland 20852

RE: Docket No.: 97N-484S

Dear Sirs:

It has been brought to my attention that the FDA is proposing to regulate even more allograft tissue as a medical device.

I- have been using allograft bone from the current bone banks for twenty six (26) years and the FDA already regulates it for safety. I see absolutely no reason for any further regulations. It is already difficult for them to provide the amount of allograft bone that we need, and further 'regulation of these banks is certainly not going to improve their efficiency.

I have never had any difficulties with the present status of the bone banks, and plead with you, please do not add anymore regulations to this group.

Sincerely,

Gerald Meier, M.D. The Collis Group, Inc.

GM:Imh

**2709**Franklin **Boulevard 4th** Floor **Cleveland**, OH 44113
(216) 363-2200 **EAX (216)** 696-3974

26900 **Cedar** Road Beachwood, OH 44122 (440) 526-2681 FAX (440) 526-2908 29101 Health Campus Drive **Medical** Building2 **Westlake,** OH 44145 (440) 892-6585 FAX (440) 892-6564 One **Eagle Valley Court** Broadview Heights, OH 44147 (440) 526-2681 **FAX** (440) **526-2908** 



2709 Franklin Blvd. • Cleveland, OH 44113

Document Management Branch (HFA-305) Food and Drug Administration 5630 Fishers Lane, Room 1061 Rockville, Maryland 20852